

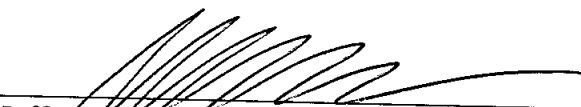
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE: TRICOR DIRECT PURCHASER	)	
ANTITRUST LITIGATION	)	C. A. No. 05-340 KAJ
	)	
THIS DOCUMENT RELATES TO:	)	Hon. Kent Jordan, U.S.D.J.
C.A. No. 05-340 KAJ (Louisiana Wholesale)	)	
C.A. No. 05-351 KAJ (Rochester Drug)	)	
C.A. No. 05-358 KAJ (Meijer, Inc., et al.)	)	

**MOTION TO FILE AMENDED COMPLAINT UNDER SEAL**

Plaintiffs Louisiana Wholesale Drug Co., Inc., Rochester Drug Co-Operative, Inc. and Meijer, Inc. and Meijer Distribution, Inc. hereby move for an Order permitting plaintiffs to file their Amended Complaint in the above-captioned actions under seal. This motion is necessary because the Amended Complaint contains information obtained from documents which defendants marked as highly confidential and then produced to plaintiffs pursuant to Local Rule 26.2, which limits public disclosure.

WHEREFORE, plaintiffs respectfully request entry of the attached Order permitting them to file their Amended Complaint under seal.

  
\_\_\_\_\_  
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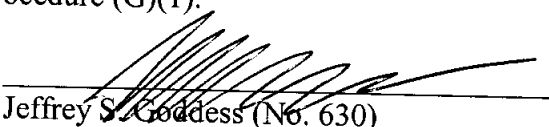
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**STATEMENT PURSUANT TO D.DEL. LR 7.1.1**

The undersigned, counsel for movants, advises that there is agreement on this motion, in that the defendants, in the absence of having seen the amended complaint, have no objection to its initial filing under seal. Further, the parties will confer again promptly to see if agreement can be reached on unsealing all or portions of the complaint that will otherwise be redacted from the public version filed in accordance with CM/ECF Administrative Procedure (G)(1).

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2005, I electronically filed a MOTION TO FILE AMENDED COMPLAINT UNDER SEAL, using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that on September 23, 2005 I caused a copy of the aforementioned document to be delivered to the following attorneys in the manner indicated:

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